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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

STATE OF NEVADA, <i>et al.</i> ,	)	Case No. 3:15-cv-00491-MMD-VPC
	)	
Plaintiffs,	)	
	)	<b>DECLARATION OF NADA CULVER IN</b>
vs.	)	<b>SUPPORT OF THE WILDERNESS</b>
	)	<b>SOCIETY, ET AL.'S MOTION TO</b>
UNITED STATES DEPARTMENT )	)	<b>INTERVENE</b>
OF THE INTERIOR, <i>et al.</i> ,	)	
	)	
Defendants, and	)	
THE WILDERNESS SOCIETY, <i>et</i> )	)	
<i>al.</i> ,	)	
	)	
Applicants in Intervention/	)	
Defendants	)	

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1 I, Nada Culver, declare as follows:

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3 1. I reside in Evergreen, Colorado. I have personal knowledge of each of  
4 the facts set forth below. I submit this declaration on behalf of myself and The  
5 Wilderness Society (TWS).

6 2. I am currently the Senior Director for Agency Policy and Planning at  
7 the Wilderness Society. I am also a member of TWS. I also oversee the BLM Action  
8 Center and National Forest Action Center at TWS; these centers are focused on  
9 engaging the public in planning and management of our public lands and  
10 advocating for responsible management.

11 3. TWS has a long-standing interest in the management of Bureau of  
12 Land Management (BLM) and Forest Service lands across the West, including in  
13 Nevada, and engages frequently in the decision-making processes for land use  
14 planning and project proposals that could potentially affect wilderness-quality  
15 lands, wildlife habitat, and other natural resources managed by the BLM and  
16 Forest Service.

17 4. TWS members and staff enjoy a myriad of recreation opportunities on  
18 public lands, including hiking, biking, nature-viewing, photography, hunting,  
19 birdwatching and quiet contemplation in the solitude offered by wild places.  
20 Founded in 1935, our mission is to protect wilderness and inspire Americans to care  
21 for our wild places. We have more than 500,000 members and supporters around  
22 the West, including in Nevada. TWS has a continuing interest in ensuring the  
23 protection of wild lands under the jurisdiction of the BLM and the Forest Service.

24 5. For my own uses of public lands, I seek out and prefer to use those  
25 federal public land that are more wild for hiking, backpacking, camping and wildlife  
26 watching. I have enjoyed watching the greater sage-grouse strutting at leks and elk  
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28

1 bugling as part of my experience on public lands and plan to continue doing so  
2 around the West.

3  
4 **The Wilderness Society's Engagement in Federal Sage-grouse  
Conservation Plans**

5 6. TWS has been actively engaged in the federal planning efforts for  
6 conservation of the greater sage-grouse since their inception, including:

7 a. TWS submitted scoping comments in April, 2012, when the federal  
8 planning efforts formally commenced.

9 b. TWS commented on the draft plans in 2013 and 2014.

10 c. TWS submitted additional comments and administrative protests on  
11 the proposed plans in 2015.

12 d. TWS members, responding to wild alerts, have submitted thousands of  
13 comments on the federal plans and also urged Congress to support the completion  
14 and implementation of these plans.

15 e. Throughout the process, TWS submitted additional recommendations,  
16 met with federal and state representatives, and worked with members of the  
17 conservation community and other stakeholders to advocate for completion of the  
18 plans and for implementing a strong, science-based, landscape-level approach to  
19 conserving the greater sage-grouse and the sage-grouse ecosystem.

20  
21 **Harm from Interference with the Federal Plans**

22 7. The federal plans set up a framework for conservation of greater sage-  
23 grouse habitat across the West. These conservation measures in these plans will  
24 conserve not only greater sage-grouse habitat but also safeguard the sagebrush  
25 ecosystem that supports hundreds of other species of value to TWS and its  
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1 members. In addition, the federal plans will protect wildlands that TWS has worked  
2 to defend for decades.


3 8. Invalidating or otherwise interfering with the implementation of the  
4 federal plans would maintain the risk to the greater sage-grouse that led the U.S.  
5 Fish and Wildlife Service to find that the species warranted protection under the  
6 Endangered Species Act absent changes to land use planning, and prevent  
7 conservation of habitat for hundreds of other species that rely on these same lands  
8 and leave wildlands in harm's way. The use and enjoyment of public lands by TWS  
9 members will also be at risk.

10 9. TWS also has an interest in the BLM and Forest Service maintaining  
11 their authority to implement conservation across the public lands. TWS has  
12 dedicated significant staff resources to supporting land use planning that takes into  
13 account conservation and ensures that other multiple uses are managed to ensure  
14 wildlife, wildlands, recreation and other conservation values are protected.  
15 Interference with these plans will undermine the discretion and authority of the  
16 BLM and Forest Service to conserve the public lands by limiting other uses and  
17 requiring proactive conservation and mitigation.

18 10. TWS and its members participated throughout the planning process  
19 that led to the Record of Decision and Approved Resource Management Plan  
20 Amendments for both the Great Basin and Rocky Mountain Regions. TWS and its  
21 members work to ensure our public lands are managed to conserve wildlands and  
22 wildlife, including through engaging in land use planning efforts. As an  
23 organization and on behalf of its individual members, TWS has a substantial  
24 interest in the outcome of this legal challenge.

1 I declare under penalty of perjury that the foregoing is true and correct.  
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3 Executed on this 10th day of November, 2015, in Denver, Colorado.  
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6 Nada Culver  
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